

BLACKFORD | CARLS

TRIAL LAWYERS

SHERINE D. BLACKFORD
HILARY P. CARLS

March 17, 2023

Via Email

Susan Moriarity Miltko
 James David Johnson
 Hannah I. Higgins
 Williams Law Firm
 235 East Pine
 P.O. Box 9440
 Missoula, MT 59807-9440
susan@wmslaw.com
james@wmslaw.com
hannah@wmslaw.com

Re: *Cole, et al., v. Montana University System, University of Montana-Missoula*, CV 21-88-M-BMM

All,

This letter serves to update you regarding the Plaintiffs' attempts to craft manageable search term requests in this matter. (Doc. 91 at 3). Plaintiffs have not yet identified a process that solves the volume issues identified by the Defendants. To ensure clarity on this issue, at this time, Plaintiffs agree that the Defendants do not need to respond to the following discovery requests to the extent they relate to search terms:

- Plaintiff Catherine Cole's First Discovery Requests (Jan. 24, 2022), UM and MUS Request for Production No. 8, UM Request for Production No. 9, and MUS Request for Production No. 14.
- Plaintiff Barbara Koostra's First Discovery Requests (Jan. 24, 2022), UM and MUS Request for Production Nos. 3 and 4.
- Plaintiff Mary-Ann Sontag Bowman's First Discovery Requests (Jan. 24, 2022), UM and MUS Request for Production No. 3, UM Request for Production No. 4, and MUS Request for Production No. 5.
- Plaintiff Rhondie Voorhees's First Discovery Requests (Jan. 24, 2022), UM and MUS Request for Production Nos. 3 and 4.

Due to the parties' agreement regarding the search term issue, no report to the Court is necessary today. (Doc. 91 at 3). Please do not hesitate to contact us to discuss this matter further. Thank you.

Cordially,

BLACKFORD CARLS P.C.



Hillary P. Carls
Sherine D. Blackford

cc: Clients
Veronica Procter